

**IN THE UNITED STATES BANKRUPTCY COURT
IN THE NORTHERN DISTRICT OF MISSISSIPPI**

IN RE:

**TIMOTHY and JERRI DANIEL
5 GROVE COVE
BYHALIA, MS 38611**

BANKRUPTCY NO: 15-11654-JDW

NOTICE AND MOTION TO DISMISS

COMES NOW, Locke D. Barkley, the duly appointed and qualified Standing **TRUSTEE** in the above cause and moves to dismiss the above proceeding for the reason that the **DEBTOR** has failed to make payments into the plan as required by Chapter 13 of the Bankruptcy Code.

NOTICE IS HEREBY GIVEN, to the **DEBTOR** herein, that unless the below required sum is received by the **TRUSTEE**, or a written responsive pleading is filed with the Clerk of the Court with a copy to the **TRUSTEE** prior to the below depicted due date, the Chapter 13 proceeding of the above **DEBTORS** will be dismissed.

WHEREFORE, **TRUSTEE** moves this Court to enter its Order of Dismissal unless said sum is received as set out herein or said responsive pleading is properly filed.

DATED: 12/07/2015

Locke D. Barkley
Chapter 13 Trustee
P.O. Box 1859
Memphis, TN 38101
(PAYMENTS ONLY)

Locke D. Barkley
Chapter 13 Trustee
6360 I-55 North
Suite 140
Jackson MS 39211
(601) 355-6661
(CORRESPONDENCE)

AMOUNT DUE: \$997.00
(As of 12/3/15 thru end of DEC 2015)
Plus accruing payments

DATE DUE: 12/28/2015

CERTIFICATE OF SERVICE

I, Locke D. Barkley, Standing Trustee, do hereby certify that I have electronically filed the foregoing with the Clerk of Court using CM/ECF system, and hereby further certify that I have served a copy of the foregoing upon the debtor(s), debtor's attorney of record and to the Office of the U.S. Trustee via electronic notice or mail.

DATED: 12/07/2015

/s/ Locke D Barkley
LOCKE D. BARKLEY
CHAPTER 13 TRUSTEE

DEBTOR'S ATTORNEY

**ROBERT GAMBRELL
GAMBRELL AND ASSOCIATES
101 RICKY D BRITT SR BLVD STE 3
OXFORD, MS 38655**